

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

VS.

TOU THAO,

Defendant.

**DEFENDANT THAO'S MOTION IN
LIMINE FOR ADDITIONAL
PREEMPTORY CHALLENGES**

Mr. Tou Thao, Defendant herein, respectfully moves the Court pursuant to Fed. R. Crim. P. 24(b)(2) for an order granting additional preemptory challenges to each defendant in this case. Fed. R. Crim. P. 24(b)(2).

This motion is based upon the virtually unprecedented publicity and notoriety of this case, including, but not limited to the televised state court trial of Derek Chauvin, the leak of the federal grand jury information, and the guilty plea in federal court of Derek Chauvin. Rather than asking for a change of venue, Mr. Thao respectfully requests that each defendant be afforded additionally preemptory challenges to ensure their constitutional right to a fair and impartial jury.

Respectfully submitted,

Dated: This 30th day of December, 2021

/s/ Robert M. Paule
Robert M. Paule (#203877)
Robert M. Paule, P.A.
920 Second Avenue South
Suite 975
Minneapolis, MN 55402
T: (612) 332-1733
F: (612) 332-9951

Natalie R. Paule (#0401590)
Paule Law P.L.L.C.
101 East Fifth Street
Suite 1500
St. Paul, MN 55101
T: (612) 440-3404
nrp@paulelaw.com

Attorneys for Tou Thao